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Scott J. Goldstein, Esq. (4291811)

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

Case No. 24-35097

Shaun Parr

Chapter 13

Chapter 13 Debtor

Hon. Cecelia G. Morris

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**NOTICE OF MOTION TO SHORTEN TIME AND SCHEDULE  
EXPEDITED HEARING FOR A MOTION UNDER 11 U.S.C. 362(C)(3)**

**PLEASE TAKE NOTICE** that on February 27, 2024 at 9:00 in the forenoon or as soon thereafter as Counsel may be heard, the undersigned counsel for, shall appear before the Honorable Cecelia G. Morris or any Bankruptcy Judge presiding in this matter at the United States Bankruptcy Court for the Southern District of New York, located at ,355 Main Street, Poughkeepsie New York for an Order pursuant to Fed. R. Bankr. P. 9006© setting an expedited hearing and shortening the time for notice of the hearing to consider Debtor's motion to extend the automatic stay pursuant to 11 U.S.C. 362(c)(3).

**PLEASE TAKE FURTHER NOTICE** that pursuant to General Order M-543 regarding Corona Virus/Covid-19 Pandemic, Court Operations under the Exigent Circumstances Created by Covid-19, the hearing on the Motion will be conducted telephonically. All attorneys, witnesses, and parties wishing to appear at, or attend, a telephonic hearing must refer to the Court's guidelines for telephonic appearances and make arrangements with Court Solutions, LLC. Pro se parties may participate telephonically in hearings free of charge through Court Solutions. The Court may, alternatively, conduct the hearing via ZOOM or other video link. All parties should reference the docket of the within matter to verify the manner in which the hearing will be held.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, the undersigned shall rely upon the motion annexed hereto.. No brief is necessary for the purposes of this motion, as the motion raises no contested issues of law, but relies for its resolution upon uncontested issues of fact.

**PLEASE TAKE FURTHER NOTICE** that responsive papers should be filed with the Court and served on counsel for the Debtor, no later than seven days prior to the return date. Responsive papers shall conform to the Federal Rules of Bankruptcy Procedure, identify the party submitting the response, and specify the rules, statutory provisions, and legal authority that support the response.

Dated: February 8, 2024

LAW OFFICES OF  
WENARSKY & GOLDSTEIN, LLC

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